



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 W. 15<sup>th</sup> STREET, SUITE 3200  
HELENA, MONTANA 59626

January 17, 2003

David M. Smith  
BNSF-Manager Environmental Remediation  
139 North Last Chance Gulch  
Helena, MT 59601

  
Dear Mr. Smith:

The *Technical Impracticability Evaluation for Groundwater Restoration* for the former Somers Tie Treating Plant located in Somers, Montana, prepared for the Burlington Northern Santa Fe Railway by the RETEC Group, Inc. has been received and reviewed by EPA and the Montana Department of Environmental Quality (DEQ).

The final Report is hereby conditionally approved as complete with the addition of responses to the following comments. In several instances, acceptable language is proposed for insertion in the document.

1. **Areal Extent of the Technical Impracticability Waiver**, page 5-3, Section 5.2.  
Additional text needs to be included in this section to explain 1) why there are two spatially distinct areas defined for the areal extent for the technical impracticability waiver, and 2) why the proposed extent of the technical impracticability waiver is not the same as that proposed for the Controlled Groundwater Area. The following text is proposed for insertion between paragraph 1 and paragraph 2 of Section 5.2:

"The smaller area has been established because samples from this well have exceeded the standard for zinc. The larger area is defined by exceedences of PAHs. Monitoring wells between the two areas do not exceed any remediation levels specified in the ROD, thus justifying the delineation of the two spatially distinct areas shown in Figure 5-1.

The area delineated for the proposed Controlled Groundwater Area (Figure 6-1) is larger than that proposed for the technical impracticability waiver (Figure 5-1). The proposed Controlled Groundwater Area describes that area in which the drilling of wells for any purpose other than remedial activities is prohibited. Groundwater withdrawals within the alluvial aquifer underlying the proposed Controlled Groundwater Area may cause contaminant migration. The purpose of the Controlled Groundwater Area is to prevent ingestion of groundwater exceeding drinking water standards for polycyclic aromatic



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hydrocarbon (PAH) compounds and zinc, and to prevent uncontrolled drilling of wells that could potentially cause exposure to and/or migration of the contaminants of concern. The purpose of the Technical Impracticability Evaluation is to establish that area in which it is not deemed possible to achieve the groundwater ARARs set in the ROD."

2. **Recommended Action**, page 6-2, Section 6.1, This section as written seems to imply that alternative remedial strategies will be considered as part of the TI process. This statement is misleading because the TI process is limited to waiving groundwater standards. Consideration of alternate remedial strategies will be made after the TI process has been completed. Please revise the wording to reflect the appropriate processes.

Editorial Comments:

Globally: Numbers with scientific notation did not print correctly. A global check of the text is needed to correct this throughout the document. DEQ noted this problem specifically on pages 2-14, 2-22, 2-23, and 2-24.

Page 2-17. Second paragraph of Section 2.4.2. Sentence 4. "The areal extent of the excavation in the swamp pond was 42,750 ft<sup>2</sup> the top ten feet of swamp pond soil contained an average...". This appears to be a run-on. Correct the sentence to read "The areal extent of the excavation in the swamp pond was 42,750 sq. ft. The top ten feet of swamp pond soil contained an average..."

Page 2-19. Section 2.4.5. Summary of Contaminant Sources. Paragraph 1. Sentence 2. "...estimates range between 5percent and 10percent of the pore spaces..." Insert a space between "5" and "percent" and between "10" and "percent".

Page 2-20. Section 2.4.5. Summary of Contaminant Sources. Paragraph 1. Sentence 6. Replace the word "impracticable" with "feasible".

Page 2-22. Section 2.5.3. Exposure Assessment. Paragraph 5. Sentence 2. Replace "S-85-5b" with "S-85-5b".

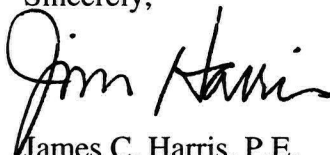
Page 4-4. Section 4.3. Alternative 2. Paragraph 1. Sentence 4. "...by a factor of 40 (i.e., 20 PVs , .05 PVs)." I believe that something is missing in the parenthetical. Please correct.

Page 4-6. Section 4.3.1. Description. Paragraph 1. Last sentence. Revise the last sentence to read "...LTU; LTU soil remediation goals have been met and the LTU was closed in 2002."

Page 4-7. Section 4.3.2. Description. Paragraph 1. "...by a factor of 40 (i.e., 20 PV , 0.53 PV)." I believe that something is missing in the parenthetical. Please correct.

Comments may be addressed by providing pages to insert into the November 27, 2003 final Report. Please provide your response by February 18, 2003. If you have any questions concerning this approval and the additional comments, please contact Lisa DeWitt, DEQ, at 406 444-0198 or Jim Harris at 406 457-5032.

Sincerely,

A handwritten signature in black ink that reads "Jim Harris". The signature is written in a cursive, flowing style.

James C. Harris, P.E.  
Remedial Project Manager

cc: L. Carlson, RETEC, Billings  
C. Cosentini, RETEC, Golden  
L. DeWitt, DEQ  
M. Wireman, 8EPR-EP